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*Counsel for Defendant Synchrony Bank*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KAY AGUERO,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,  
INC.; EQUIFAX INFORMATION  
SERVICES, LLC; SYNCHRONY  
FINANCIAL; FIRST SAVINGS BANK;  
KOHL'S INC.; AVANT, LLC; CAPITAL  
ONE BANK, NATIONAL ASSOCIATION;  
THE BANK OF MISSOURI; DISCOVER  
BANK; FIRST BANK & TRUST; AND  
COMENITY CAPITAL BANK,

Defendants.

Case No.: 2:23-cv-01155-APG-DJA

**JOINT UNOPPOSED MOTION TO  
EXTEND DEADLINE FOR DEFENDANT  
SYNCHRONY BANK TO RESPOND TO  
COMPLAINT**

**(FIRST REQUEST)**

Defendant Synchrony Bank ("Synchrony") and Plaintiff Kay Aguero ("Plaintiff"), by counsel and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, respectfully request this Court extend the deadline in which Synchrony has to answer or otherwise respond to Plaintiff's Complaint, through and until September 6, 2023. In support of this Motion, the parties stipulate as follows:

1. This is the first stipulation for extension of time for Synchrony to respond to Plaintiff's Complaint.

2. On July 21, 2023, Plaintiff filed a Complaint with this Court [ECF No. 1].

3. Synchrony's current deadline to respond to the Complaint is August 16, 2023.

4. In order to evaluate this matter and explore the possibility of early resolution with Plaintiff, counsel for Synchrony desires a twenty-one (21) day extension until September 6, 2023, to file a response to the Complaint.

5. Counsel for Synchrony conferred with Plaintiff's counsel regarding this requested extension, and Plaintiff's counsel has no objection.

6. The foregoing Motion is filed in good faith and not for dilatory or other improper purpose.

7. Plaintiff would not suffer any prejudice by the Court permitting Synchrony the requested extension of time and has consented to the requested extension.

8. Granting this Motion is in the interests of justice and is otherwise the right and proper thing to do.

DATED this 7th day of August, 2023.

**FREEDOM LAW FIRM**

**LEWIS ROCA ROTHGERBER CHRISTIE LLP**

By: /s/ Gerardo Avalos (w/permission)

By: /s/ Brittni Tanenbaum

Gerardo Avalos  
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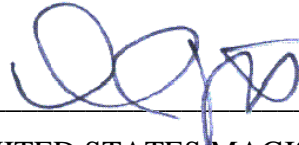
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*Counsel for Plaintiff Marilea Ellis*

*Counsel for Defendant Synchrony Bank*

**ORDER**

**IT IS SO ORDERED.**



UNITED STATES MAGISTRATE JUDGE

DATED: August 8, 2023

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed via electronic filing using the CM/ECF system with the Clerk of the Court on August 7, 2023 which sent e-mail notification of such filing to all CM/ECF participants.

s/ Sharon L. Kuller

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**LEWIS**  **ROCA**